

1 **TIFFANY & BOSCO, PA**

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9
10 **Attorney for Movant Lobel Financial Corporation**

11 **UNITED STATES BANKRUPTCY COURT**

12 **DISTRICT OF NEVADA**

13
14 **In Re:**

15 **Vince Santos and Darlene J. Santos**

16 **Chapter 13**

17 **Bk Case No.: 13-16247-MKN**

18 **Debtors**

19
20 **BREACH AND FAILURE TO COMPLY WITH TERMS OF THE ADEQUATE PROTECTION**
ORDER WITH CERTIFICATE OF MAILING

21 TO: **Vince Santos and Darlene J. Santos**

22 DEBTORS

23 TO: **Monica T. Centeno**

24 ATTORNEY FOR THE DEBTORS

25 TO: **Rick A. Yarnall**

26 CHAPTER 13 TRUSTEE

27 TO: **ALL INTERESTED PARTIES**

28 TO: **THE OF THE ABOVE ENTITLED COURT**

29
30 Debtors have failed to remit payments in accordance with Stipulation for Adequate Protection
31 and Termination of Automatic Stay Upon Non-Payment ("Stipulated Order") entered between Secured
32 Creditor, Lobel Financial Services and Debtors on November 10, 2015. To date, Secured Creditor has not
33 received the regular monthly payment of \$358.50 due on September 30, 2015, and Debtors have failed to
34 make all of the payments required by the Stipulated Order. Through September 30, 2015, Debtors still
35 owe \$67.00 with another \$291.50 plus \$358.50 regular payment coming due on October 30, 2015.

36
37 The amount currently due to Lobel Financial Services which does not include the attorney's fee
38 of \$100.00 as provided in the Stipulated Order is \$525.50. Debtor must tender one (1) check of the
39 **CERTIFIED FUNDS ONLY**, one payment must be made payable to Lobel Financial Services in the

1 amount of \$525.50. The payment made payable to Lobel Financial Services shall be sent via certified
2 mail and delivered to: **Lobel Financial Corporation, 1150 N. Magnolia, Anaheim, California 92801**
3 and must be received within 15 days of the date of this Notice, no later than November 26, 2015.

4 IF SAID PAYMENT IS NOT REMITTED ON OR BEFORE THAT DATE TO THE ADDRESS
5 INDICATED, Secured Creditor may submit an Order to the Court to allow it to commence foreclosure
6 proceedings on the subject property described as 2004 BMW 3 Series – VIN: WBAET37484NJ47678. If
7 Debtors are represented by counsel, please note that under the Supreme Court Rules of the State of
8 Nevada, the undersigned counsel are absolutely PROHIBITED from speaking directly with Debtors in
9 regards to this Breach. Debtors should contact their attorney for any advice on curing this default. If
10 Debtors believe this default to be in error, then Debtors MUST have their attorney contact the
11 undersigned counsel prior to the deadline for payment or an Order may be entered against you.
12

13 Undersigned counsel is not at liberty to make additional deals with Debtors on restructuring the
14 payments beyond what has already been agreed to. If Debtors have any questions on this matter, then
15 Debtors must contact their ATTORNEY.

16 DATED this 11 day of November, 2015.

17 
TIFFANI & BOSCO, PA

18 /s/ Gregory L. Wilde

19 **GREGORY L. WILDE**
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22 Las Vegas, Nevada 89107
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6 **Attorney for Movant Lobel Financial Corporation**

7 **UNITED STATES BANKRUPTCY COURT**

8 **DISTRICT OF NEVADA**

9 In Re:

Chapter 13

10
11 **Vince Santos and Darlene J. Santos**

Bk Case No.: 13-16247-MKN

12
13 **Debtors**

14
15 **CERTIFICATE OF MAILING BREACH AND FAILURE TO COMPLY**
WITH TERMS OF THE ADEQUATE PROTECTION ORDER

16
17 1. On November 11, 2015, I served the following document (*specify*):

18 *BREACH AND FAILURE TO COMPLY WITH TERMS OF THE ADEQUATE PROTECTION
ORDER*

19
20 2. I served the above-named document by the following means to the persons as listed below:

21 *(Check all that apply)*

22 a. ECF System *(You must attach the "Notice of Electronic Filing", or list all persons and addresses*

23 *and attach additional paper if necessary)*

24
25
26 Debtors' Counsel: Monica T. Centeno; mcenteno@mcentenolaw
Chapter 13 Trustee: Kathleen A. Leavitt; courtsecf3@las13.com

1 **b. United States mail, postage fully prepaid**

2 *(List persons and addresses. Attach additional paper if necessary)*

3 Debtors' Counsel: Monica T. Centeno, 285 E. Warm Springs Rd., Suite 105,
4 Las Vegas, Nevada 89119

5 Debtors: Vince Santos & Darlene J. Santos, 8424 Wild Diamond Ave., Las Vegas, Nevada
89143

6

7 **I declare under penalty of perjury the foregoing is true and**
8 **correct.**

9

10 Signed on (date): 11/11/15

11 Laurali Cano

12 (NAME OF DECLARANT)

13 

14 (SIGNATURE OF DECLARANT)

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